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Attorneys for the Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re | : | Chapter 11 Case No. |
| | : | |
| LEXINGTON PRECISION CORP., <u>et al.</u> , | : | 08-11153 (SCC) |
| | : | |
| Reorganized Debtors. | : | (Jointly Administered) |
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**NOTICE OF PRESENTMENT OF REVISED PRETRIAL
SCHEDULING ORDER REGARDING REORGANIZED DEBTORS'
OBJECTION TO PROOF OF CLAIM 263 OF LORRAINE CERIMELE**

PLEASE TAKE NOTICE that Lexington Precision Corporation and Lexington Rubber Group, Inc. (together, the “**Reorganized Debtors**”) will present the annexed proposed scheduling order (the “**Revised Scheduling Order**”), establishing a revised timeline for discovery and pretrial motions related to the adjudication of the Debtors’ objection to Proof of Claim 262 filed by Lorraine Cerimele¹ to the Honorable Shelley C. Chapman, United States Bankruptcy Judge of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), for signature on **Thursday, April 14, 2011 at 12:00 p.m. (Eastern Daylight Time)**. If no objections or responses are timely and properly interposed, the Bankruptcy Court may enter the Revised Scheduling Order without a hearing.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Revised Scheduling Order, if any, must (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York; and (c) set forth the name of the objecting party, the basis for the objection, and the specific grounds therefore. Any

¹ *Debtors’ Objection to Proof of Claim 262 of Lorraine Cerimele*, dated December 30, 2008 [ECF No. 503].

objections or responses must be filed with the Bankruptcy Court no later than **Thursday, April 14, 2011 at 11:30 a.m. (Eastern Daylight Time)** (the “**Objection Deadline**”). In accordance with General Order M-242, registered users of the Bankruptcy Court’s case filing system must file their objections and responses electronically. General Order M-242 may be found at www.nysb.uscourts.gov. All other parties-in-interest must file their objections and responses with the Bankruptcy Court on a 3.5 inch floppy disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format) and deliver a hard copy directly to the chambers of the Honorable Shelley C. Chapman.

PLEASE TAKE FURTHER NOTICE that all objections and responses must be served so as to be received no later than the Objection Deadline, upon: (a) the Reorganized Debtors, Lexington Precision Corporation, 800 Third Ave. 15th Floor, New York, New York 10023 (Attn: Michael A. Lubin); (b) the attorneys for the Reorganized Debtors, Weil, Gotshal & Manges LLP, 1300 Eye Street, NW, Suite 900, Washington, DC 20005 (Attn: Adam P. Storchak), 767 Fifth Avenue, New York, New York 10153 (Attn: Marvin Mills); (c) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Paul Schwartzberg); and (d) counsel for Cerimele, Frank R. Bodor, 157 Porter Street NE Warren, Ohio 44483.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely and properly filed, a hearing will be held at the Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, at a date and time to be established by the Bankruptcy Court. If a hearing is necessary, the Reorganized Debtors will provide notice of the hearing when a date and time is set. The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: April 11, 2011
New York, New York

/s/ Adam P. Storchak
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**REVISED SCHEDULING ORDER FOR PRETRIAL
PROCEEDINGS REGARDING THE REORGANIZED DEBTORS'
OBJECTION TO PROOF OF CLAIM 263 OF LORRAINE CERIMELE**

Upon the Court having entered that certain *Scheduling Order for Pretrial Proceedings Regarding the Reorganized Debtors' Objection to Proof of Claim 263 of Lorraine Cerimele* [ECF No. 1053] (the "**Scheduling Order**"), establishing a timeline for pretrial proceedings related to the adjudication of the objection (the "**Objection**") filed by Lexington Precision Corporation and Lexington Rubber Group, Inc. (together, the "**Reorganized Debtors**") to Proof of Claim 263 filed by Lorraine Cerimele ("**Plaintiff**"); and the Reorganized Debtors and Plaintiff having consensually agreed to the extension of certain of the deadlines set forth in the Scheduling Order; it is

ORDERED that the Scheduling Order is hereby modified in accordance with the decretal paragraphs below; and it is further

ORDERED that the Reorganized Debtors' expert report, if any, must be provided to Plaintiff no later than **May 27, 2011**; and it is further

ORDERED that any motions for summary judgment regarding the Objection must be filed no later than **June 10, 2011**; and it is further

ORDERED that the Court shall hold a further status conference on June,
2011, by which counsel may appear telephonically.

Dated: April __, 2011
New York, New York

UNITED STATES BANKRUPTCY JUDGE